

**REMARKS**

In the Office Action, the drawings were objected to, and all of pending claims 1-29 were rejected. By the present Response, the specification is amended. Upon entry of the amendments, claims 1-29 will remain pending in the present patent application. Reconsideration and allowance of all pending claims are requested.

**Objection to the Drawings**

The Examiner objected to the drawings due to the use of reference numeral 90 in Fig. 6 which was not found in the text as filed. The specification has been amended by the present Response to insert a mention of reference numeral 90 at the appropriate location in the text. In particular, the paragraph replaced by the present amendment extends from page 11, line 30 to page 12, line 19 in the application as filed. The addition of the passage relating to the reference numeral 90 adds no new subject matter. The amendment is believed to obviate the objection to the drawings, and its consideration and approval are requested.

**Rejections Under 35 U.S.C. § 103 In view of Brinegar et al. and Huang et al.**

In the Office Action, all of claims 1-29 were rejected as unpatentable over a combination of Brinegar et al. in view of Huang et al. The Examiner enumerated a number of passages from both references said to read on or make obvious the recitations of the pending claims. Applicants note, however, that the recitations indicated by the Examiner do not, in fact, correspond with the pending claims, and that the passages relied upon by the Examiner do not support a *prima facie* of obviousness.

In formulating the rejection, the Examiner indicated that Brinegar et al. teaches "designating a portion of the screen at a controlled computer based upon the input event data [from the controlling computer] and the program [run by the

controlled computer].” As support for this assertion, the Examiner points to Brinegar et al. at col. 2, lines 59-67, where one reads:

In an embodiment of the present invention, the collaborative design activity is a shared drawing activity between a community of users within the architecture engineering construction (AEC) industry. Each user utilizes a video display as a shared drawing space that can display one or more drawings. These drawings can include computer-aided design (CAD), drawings, construction blueprints, architectural drawings, computer-design graphic images, and the like.

The passage clearly does not relate to designating any portions of a screen at a controlled computer based upon input event data from a controlling computer and a program running at a controlled computer. Indeed, little comparison is even possible between the passage identified by the Examiner and the claimed subject matter said to be taught by the passage. Certainly, the passage does not support the assertion that Brinegar et al. teaches designating any portion of a screen at a controlled computer based upon such input event data and a program.

Applicants add that the claims do not, in fact, recite the subject matter in the terms set forth by the Examiner. In fact, claim 1, quite the contrary, recites “identifying a logical block of a screen display affected by the input event at the controlled computer based upon the program and the input event data.” This logical block identification is a special procedure performed by the claimed method that permits efficient progressive caching of the display data as inputs are received from a controlling computer and a program is run based upon such input events at a controlled computer. Nothing in Brinegar et al. can be found, and certainly not in the passage relied upon by the Examiner, for teaching of such logical block identification. The remaining independent claims recite somewhat similar subject matter, in all cases not taught by Brinegar et al. as argued by the Examiner.

The Examiner also alleges that Brinegar et al. teaches “caching a portion of the screen at the controlling [computer].” In support for this point, the Examiner points to Brinegar et al., col. 3, lines 66-67. The passage identified by the Examiner does not, in fact, include a complete sentence. As best understood, the context of the passage reads:

The memory port 114 of the client computer 102 may be implemented as RAM (random access memory) or a combination of RAM and non-volatile memory such as magnetic disk storage. The Memory 114 of the client computer 102 can contain the following:

...

a drawing repository 138 that stores one or more drawings 140. The drawing 140 can be stored in any computer-generated image or graphic file format, such as but not limited to BMP, DXF, HPGL, DIB, TGA, GIF, TIF, PCX, JPG, and the like; and other procedures and data structures. (Brinegar et al., col. 3, line 45 - col. 4, line 3).

Clearly, the passage has nothing whatsoever to do with caching of a portion of a screen at a controlling computer. The drawing repository recited in the passage does not teach a portion of a screen that is cached at a controlling computer. Certainly, the passage cannot teach the recitation of claim 1, which reads “caching display data for at least the logical block at the controlling computer.” Similarly, the passage does not teach or even suggest similar recitations of the other independent claims.

The Examiner relies upon the Huang et al. reference for teaching of a cache manager which maintains a local copy of objects at a server controlled computer. However, nothing in the Huang et al. reference suggests that the server presents a

display or screen in any manner, either as a controlling or controlled computer, along with another computer in a collaborative computing environment. Rather, one skilled in the art would simply glean from the Huang et al. reference that copies of certain objects are stored locally at a user and at a server. Huang et al. do not teach the designation of portions of screens at simultaneously collaborating computers, or the caching of portions of screens based upon an input event from a controlling computer and a program run at a controlled computer. Thus, the Huang et al. reference does nothing to obviate the deficiencies of the Brinegar et al. teachings discussed above.

Accordingly, Brinegar et al. and Huang et al. cannot establish a *prima facie* case of obviousness against any one of the pending independent claims. Moreover, Applicants strongly submit that neither reference teaches or suggests the subject matter of the claims that depend from the pending independent claims, and that these claims are equally patentable for the subject matter they separately recite, as well as by virtue of their dependency from an allowable base claim. Reconsideration and allowance of all of the pending claims over Brinegar et al. and Huang et al. are requested.

**Rejections Under 35 U.S.C. § 103 In view of Bates et al. and Curtis et al.**

Alternatively, the Examiner rejected all of claims 1-29 as unpatentable over Bates et al. and Curtis et al. Applicants first note that the rejection is improper. In particular, the Examiner has not formulated any contribution of Curtis et al. in any way to the rejection formulated. Accordingly, Applicants can only address the contributions of Bates et al. identified by the Examiner. Because the rejection is considered improper, Applicants request that, if the Examiner intends to maintain this rejection, a further non-final Office Action be issued in which the teachings of

Curtis et al. believed to be combinable with those of Bates et al. be clearly set forth for consideration and refutation by the Applicants.

As best understood, the various elements of the independent claims are rejected based on Bates et al. However, Bates et al. fail to teach a number of the elements recited in the claims. For example, the Examiner argues that Bates et al. teach "transmitting input event data from the controlling computer to the controlled computer via the network." In support of this contention, the Examiner recites a passage at col. 5 of Bates et al., lines 33-42, where one reads:

Fig. 2 depicts a pictorial representation of a window including examples of features of a multi-user interface supported by the present invention. Window 18 is a conventional window as would appear on a display screen on a computer 12. A locally generated mouse pointer 22 is available for operating control features of the window by a user utilizing a mouse. The term "mouse" may refer to any type of operating system supported pointing device including, but not limited to a mouse, track ball, light pen, touch screen, and the like.

Clearly, this passage has nothing whatsoever to do with transmitting an input event from a controlling computer to a controlled computer. The Examiner, on the same point, cites a passage from col. 12, lines 3-9 of Bates et al. where one reads:

Next, decision block 214 is utilized to determine if an input has been received from a user. If so, decision block 216 is utilized to determine if the command was valid or not. If the command is not valid, the process warns the user from block 218 and returns to block 214 analyze [sic] the next user entry. If the command is valid, block 220 is utilized to transmit the edit command to the server.

Again, while the passage may relate to receiving a valid or invalid input, the passage in no way teaches transmitting input event data from a controlling computer to a controlled computer.

The Examiner also contends that Bates et al. teaches “designating a portion of the screen at a controlled computer based upon the input event data [from the controlling computer] and the program [run by the controlled computer].” In support of this position, the Examiner cites a passage of Bates et al. found in col. 3, lines 19-24. This passage reads as follows:

The collaborative computer-based system includes multiple display devices, a shared data object that is simultaneously accessible by multiple users within the system. Portions of the shared data object may be displayed on the display devices and cursors are provided within the shared data object.

Plainly, this passage does not relate to designating portions of a screen at a controlled computer based upon input event data from a controlling computer and a program run at a control computer. While data objects may be accessed by multiple users, the passage does not teach the type of logical designation of portions of a screen recited in the pending claims. Without a doubt, the passage cannot support a *prima facie* case of obviousness even for the reformulated passage indicated by the Examiner.

Finally, the Examiner contends that Bates et al. teaches “caching the portion of the screen at the controlling and controlled computer.” In support of this contention, the Examiner cites a passage of Bates et al. found at col. 5, line 15. Here again, line 15 of col. 5 does not recite a complete sentence, although the context reads:

Local area network 8 supports a collaborative computer based editing system relating to a data object stored on a server. Local network 8 provides data communication over a transmission channel 10 between a plurality of personal computers 12. (Bates et al., col. 5, lines 13-17).

On this point, the Examiner is reminded that all recitations of each and every claim must be considered. The present claims do not relate simply to a collaborative computing environment. Rather, the claims relate to the specific subject matter recited. Accordingly, any prior art, to establish a *prima facie* case of obviousness, must recite, teach, disclose, or at least suggest the recited subject matter. The passage indicated by the Examiner does not do this. No teaching whatsoever in Bates et al. can be found for caching a portion of a screen at a controlling computer and a controlled computer, even if this were the recitation found in the pending claims, which it is not.

In further support of this position, the Examiner recites a passage of Bates et al. from col. 12, line 1. Again, col. 12, line 1 is not a complete sentence. As can be best understood, and within the context, the Examiner intended to cite parts of the process for editing disclosed by Bates et al. The extended context of this passage is reproduced below:

Referring now to Fig. 19, a high level flow chart depicting operation of a collaborative editor for either text or graphics application at a client is depicted. The process begins at block 206 with identification of a shared document to edit. Next, at block 208, the client contacts the server and requests the document identified at block 206. The transmission out of the request is indicated by the letter "A". Receipt of the transmission by the server also indicated by the letter "A", was indicated at block 200 of Fig. 18 above. At block 210 the client receives its copy of the document from the server, indicated by the letter "B". The document includes a target object for editing, the cursor list, cursor records, and association/lock records. The document is stored in

the client memory. Finally, at block 212 a local editor is initialized. Editing can now begin.

Next, decision block 214 is utilized to determine if an input has been received from the user. If so, decision block 216 is utilized to determine if the command was valid or not. If the command was valid, the process is not valid, the process warns the user from block 218 and returns to block 214 analyze [sic] the next user entry. If the command is valid, the block 220 is utilized to transmit the edit command to the server. The transfer point between the local editor program and the server editor program is indicated by the letter "C". (Bates et al., col. 11, line 55 - col. 12, line 11.)

It is noted that this passage includes the passage identified above by the Examiner which was said to support the teaching of transmitting input event data. Applicants note that even this extended passage in no way teaches caching a portion of a screen at controlling and controlled computers. No such selective caching is performed by Bates et al.

Given the shortcomings of Bates et al. with regards to the recitations of the claims, Applicants submit that a *prima facie* case of obviousness has not been made by the Examiner. Applicants further note that the Curtis et al. reference, as best understood in combination with Bates et al., does not obviate these deficiencies. Again, however, Applicants cannot, at present, address any such combinations as the combinations required for establishing the *prima facie* case of obviousness against the independent claims is not explained by the Examiner in the Office Action.

Applicants further believe that all of the pending dependent claims are equally allowable both by virtue of their dependency from an allowable base claim, and for the subject matter they separately recite.

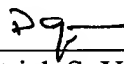


**Conclusion**

In view of the amendment to the specification and the foregoing remarks, it is believed that the pending claims are clearly allowable over all of the cited prior art. Accordingly, reconsideration and allowance of all pending claims are requested. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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